

Cody, Karen

From: Taylor, Kevin
Sent: Wednesday, August 28, 2019 2:05 PM
To: Cody, Karen
Cc: Russo, Todd; Dressler, Jason
Subject: C. R. Bard - FOIA Assignment for EPA-R4-2019-007919 (2nd email)



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From: Arias, Megan <arias.megan@epa.gov>
Sent: Monday, July 29, 2019 12:57 PM
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Cc: Taylor, Kevin <Taylor.Kevin@epa.gov>
Subject: Sterigenics and BD information

Hi all,

Kevin and I called Georgia EPD and got some information about Sterigenics and BD as seen below.

- Sterigenics
 - The current compliance status is that the facility is in compliance.
 - There is no history of problems or any noncompliance going back to at least 2005.
 - The company performed stack tests in October 2014 and March 2016. The facility is subject to 40 CFR Part 63, Subpart O – Ethylene Oxide Emissions Standard for Sterilization Facilities [EtO MACT]. The EtO MACT requires 1 ppm maximum outlet concentration or 99% emission reduction (see § 63.362(d)). The March 2016 test resulted in an average EtO control efficiency of 99.999984% for the sterilization chamber and the aeration room using a ceilcote packed tower scrubber. The testing was on a weighted basis (lbs).
 - The company is in discussions to install additional controls but has not submitted an application at this time.
 - Sterigenics last inspection (FCE) was October 25, 2017 and there were no issues found
- Becton Dickinson (DB) (formerly CR Bard)
 - The current compliance status is that the facility is in compliance.

- There is no history of problems or any noncompliance related to emissions. In June 2003, there was an enforcement action due to the late submission of a Title V permit renewal application, which was assessed a penalty of \$5,000.
- The company performed a stack test in 2012. The facility is subject to 40 CFR Part 63, Subpart O – Ethylene Oxide Emissions Standard for Sterilization Facilities [EtO MACT]. The EtO MACT requires 1 ppm maximum outlet concentration or 99% emission reduction (see § 63.362(d)). The 2012 test resulted in an average EtO control efficiency of 99.995% for the sterilization chamber and the aeration room using a thermal oxidizer. The testing was done on a ppm concentration basis. Since testing could only measure down to 0.7 ppm, that became the lower limit. Since there was no detection of EtO at the outlet, that was the basis of the emission reduction efficiency.
- EPD is opening up discussions with the company on installing additional controls.
- BD's last inspection (FCE) was May 21, 2015 and there were no issues found.

Thanks!

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